

EXHIBIT 3

Tanck, Paul J.

From: Tanck, Paul J.
Sent: Tuesday, January 15, 2013 3:22 PM
To: Elana Gloetzner; Arnie Weintraub
Cc: Tanck, Paul J.; bswedlow@honigman.com; Vakili, Kamran; Martinez, Jacob
Subject: Rockwell v. Secure Crossing

Elana,

On our call today you explained that Secure Crossing will seek a protective to prevent Mr. Buechler from producing any documents to attorneys at Chadbourne and Parke (outside counsel for Rockwell) in response to a subpoena because some of the documents that Mr. Buechler may produce may not be relevant to this case.

I explained to you that whether the documents are relevant or not, there is a protective order in this case, seen at Docket 30, that will guard the confidentiality of any documents produced by Mr. Buechler and that any production would be viewed ONLY by myself and others at Chadbourne and Parke and not Rockwell.

You stated that this was still insufficient because you have no idea what Mr. Buechler may produce, and without knowing that information, Secure Crossing needs a protective order.

We ask that you reconsider your position and avoid burdening the Court with motion practice on a protective order that is unnecessary.

Best regards,

Paul

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